

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Nancy Virginia Focaccia,
Debtor.

Case No. 23-12964-mdc

Chapter 7

Debtor's Motion to Reopen Case

AND NOW, Debtor Nancy Virginia Focaccia, by and through her attorney, moves this Court to reopen this case. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 7 on September 29, 2023.
2. The Debtor received a discharge on January 11, 2024, and this case was closed on January 12, 2024.
3. The Debtor requests that the Court reopen this case so that she can file a complaint against JP Morgan Chase for violating the automatic stay and the discharge order.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in her favor as may be necessary and proper under the law.

Date: February 5, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: */s/ Michael I. Assad*
Michael I. Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com